

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

BRISTOL COUNTY,)
Plaintiff,)
v.)
MERSCORP., INC., MORTGAGE)
ELECTRONIC REGISTRATION SYSTEMS,)
INC., BANK OF AMERICA, N.A., BAC)
HOME LOANS SERVICING LP,)
CITIBANK, N.A., CITIMORTGAGE, INC.,)
GMAC MORTGAGE, LLC, JPMORGAN)
CHASE BANK, N.A., STATE STREET)
CORP., WELLS FARGO BANK, N.A. and)
DOE CORPORATIONS 1-MMM,)
Defendants.)

Case No. 12-cv-10778-JGD

AGREED MOTION TO EXTEND TIME

On May 1, 2012, GMAC Mortgage, LLC (“GMACM”) filed a Notice of Removal pursuant to 28 U.S.C. §§ 1332, 1441 and 1446, Federal Rule of Civil Procedure 81(c), and Local Rule 81.1. All other named defendants—MERSCORP, Inc., Mortgage Electronic Registration Systems, Inc., Bank of America, N.A., BAC Home Loans Servicing LP, CitiBank, N.A., CitiMortgage, INC., JPMorgan Chase Bank, N.A., State Street Corp., and Wells Fargo Bank, N.A.—have consented to removal.

After agreeing to allow Defendants until May 31, 2012 to respond to the complaint, however, Plaintiff Bristol County notified defendants that it plans to file a motion to remand this matter back to state court.

Plaintiff and Defendants have agreed to the following schedule to allow time for Plaintiff’s motion to remand to be fully briefed and considered before Defendants are required to respond to the complaint:

- Motion to Remand, due June 7;

- Response to Motion to Remand, due July 9;
- Reply in Support of Motion to Remand, due July 23;
- Response to Complaint, due 30 days after ruling on motion to remand.

Accordingly, GMACM hereby requests that the above agreed schedule be entered to allow the parties to fully brief the expected Motion to Remand before Defendants are required to move, answer or otherwise respond.

Defendant,
GMAC MORTGAGE, LLC
By its attorneys,

/s/ Richard E. Briansky
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Dated: May 11, 2012

CERTIFICATE OF SERVICE

I, Richard E. Briansky, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent via first-class mail to those indicated as non-registered participants on May 11, 2012.

/s/ Richard E. Briansky
Richard E. Briansky